

# **EXHIBIT 1**

NO. 2021-CCL-00597

HUGO MEDELLIN, ) IN THE COUNTY COURT  
)  
Plaintiff, )  
)  
VS. ) AT LAW NO. 3  
)  
ARION MORSHEDIAN and )  
SPACE EXPLORATION )  
TECHNOLOGIES CORP., ) CAMERON COUNTY, TEXAS

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REMOTE ORAL AND VIDEOTAPED DEPOSITION OF  
HUGO MEDELLIN  
AUGUST 2, 2022

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REMOTE ORAL AND VIDEOTAPED DEPOSITION of HUGO MEDELLIN, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on August 2, 2022, from 10:59 a.m. to 5:06 p.m., before Heather L. Garza, CSR, RPR, in and for the State of Texas, recorded by machine shorthand, at the offices of HEATHER L. GARZA, CSR, RPR, The Woodlands, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto; that the deposition shall be read and signed before any notary public.

1           A.    I would think that -- yes, I would think  
2 that's safe because I have never collided because of  
3 that.

4           Q.    (BY MS. PECTOR) **How long have you been**  
5 **working for Domino's Pizza?**

6           A.    Three years.

7           Q.    During the three years that you've been  
8 working for Domino's Pizza, it was routine for you to  
9 look at your phone while you were making deliveries,  
10 correct?

11          A.    Yes.

12          Q.    You are still working for Domino's Pizza  
13 today, correct?

14          A.    Yes.

15          Q.    You're still performing the same job duties  
16 that you performed at the time of the accident,  
17 correct?

18          A.    Correct.

19          Q.    You're still working the same number of hours  
20 now that you worked prior to the accident for  
21 Domino's, correct?

22          A.    Correct.

23          Q.    Is it correct that you are not seeking any  
24 lost wages in this case?

25          A.    To be honest with you, I stopped working for

1       Domino's location you go to?

2       A.     Maybe 2 miles.

3       Q.     **Do you ever travel outside of the area for**  
4       **work?**

5       A.     No.

6       Q.     **What are your typical daily job duties for**  
7       **Trimac?**

8       A.     I create work orders. I help with payments,  
9       and then I tell the washing station washing trucks,  
10      tanks, pipes, and cars.

11      Q.     **And when you're washing vehicles, you're**  
12      **using your back and your shoulders, correct?**

13      A.     Yes.

14      Q.     **You also are able to move your neck and your**  
15      **body when you're washing the vehicles, correct?**

16      A.     I have to.

17      Q.     **How long have you worked at Trimac?**

18      A.     Seven years.

19      Q.     **What kind of work did you do before you**  
20      **started working at Trimac?**

21      A.     I work as a security guard.

22      Q.     **In Mexico or in Brownsville?**

23      A.     Brownsville.

24      Q.     **Where did you work?**

25           **THE INTERPRETER:** This is interpreter